

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Nicole Amato, et al. v. Islamic Republic of Iran, et al.</i>	21-cv-10239 (GBD)(SN) ECF Case

**PLAINTIFFS' NOTICE OF MOTION FOR ENTRY OF PARTIAL
FINAL DEFAULT JUDGMENTS ON BEHALF OF *AMATO/IRAN*
PERSONAL-INJURY PLAINTIFFS**
(*AMATO/IRAN* PERSONAL INJURY I)

PLEASE TAKE NOTICE that upon the accompanying declaration of John M. Eubanks, with exhibits, and the accompanying memorandum of law, the Plaintiff identified in Exhibit A to the accompanying declaration of John M. Eubanks respectfully moves this Court for an Order awarding (1) compensatory damages for pain and suffering in amounts commensurate with the injuries this individual sustained during the Terrorist Attacks on September 11, 2001 and in accordance with prior precedent in the U.S. District Court for the District of Columbia in similar cases factoring in an upward departure on damages values based on the indelible impact of the Terrorist Attacks of September 11, 2001; (2) economic damages for the Plaintiff identified in the expert report attached as Exhibit C to the Eubanks Declaration; (3) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; and (4) leave for the *Amato/Iran* Personal-Injury Plaintiff identified in Exhibit A to seek punitive damages or other damages at a later date.

Plaintiff's request is made in connection with Plaintiffs' August 31, 2022 request for judgment as to liability against Iran, which is currently pending. *See* (ECF Nos. 8475, 8477-79).

Dated: New York, New York
September 9, 2022

Respectfully submitted,

/s/ Jerry S. Goldman

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